

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

JENNIFER MILLER,

Plaintiff,

v.

MICHAEL J. ANDERSON, *et al.*,

Defendants,

and

FIRSTENERGY CORP.,

Nominal Defendant.

Judge John R. Adams

Case No. 5:20-cv-01743-JRA

STATUS REPORT OF DEFENDANT CHARLES E. JONES

Pursuant to the Court's Case Management Plan (ECF 160), Counsel for Mr. Jones provides the following status report covering the forty-five-day period of November 9, 2021 through December 23, 2021:

Discovery. Pursuant to the Court's Case Management Plan (ECF 160), Mr. Jones worked in good faith with the other parties to schedule party depositions. (*See* ECF 192, Deposition Schedule.) In accordance with the Court's Case Management Plan (ECF 160), Mr. Jones filed his initial disclosures on November 22, 2021. (ECF 178.) Mr. Jones made an initial production of documents on November 20, 2021. Mr. Jones continues to engage in good faith negotiations with plaintiffs over search parameters for additional documents. Mr. Jones and Plaintiffs have reached agreement on several outstanding items and are working toward agreement on others. Mr. Jones received additional requests for production, requests for admission, and interrogatories on December 15, 2021 and December 17, 2021. Mr. Jones anticipates completing his document productions and responses on or before the applicable deadlines.

Additionally, Mr. Jones has served a subpoena for documents and is engaged in negotiations over the scope and timing of the subpoenaed entity's production of documents. Mr. Jones anticipates serving additional discovery requests.

Settlement discussions. Pursuant to the instructions from the Case Management Conference on November 8, 2021 and the Court's subsequent order (ECF 197), Mr. Jones filed under seal his response to the settlement demand on December 16, 2021. (ECF 212, 213.) The parties anticipate that a mediation will occur on February 1, 2022.

Motions. Mr. Jones has filed no motions during the relevant period.

Date: December 23, 2021

Respectfully submitted,

/s/ Douglas L. Shively

Daniel R. Warren (0054595)
Carole S. Rendon (0070345)
Douglas L. Shively (0094065)
Jeremy S. Dunnaback (0098129)
Baker & Hostetler LLP
127 Public Square, Suite 2000
Cleveland, Ohio 44114
T: (216) 621-0200
F: (216) 696-0740
dwarren@bakerlaw.com
crendon@bakerlaw.com
dshively@bakerlaw.com
jdunnaback@bakerlaw.com

F. Joseph Warin (*admitted pro hac vice*)
William S. Scherman (*admitted pro hac vice*)
Jason J. Mendro (*admitted pro hac vice*)
Jason R. Meltzer (*admitted pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5306
Telephone: (202) 955-8500
Facsimile: (202) 467-0539
fwarin@gibsondunn.com

wscherman@gibsondunn.com
jmendro@gibsondunn.com
jmeltzer@gibsondunn.com

Counsel for Defendant Charles E. Jones

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2021, the foregoing Notice of Subpoena was served by email upon counsel of record for all parties.

/s/ Douglas L. Shively

Counsel for Defendant Charles E. Jones